

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

JAMAR LEE-STINSON

Case No.

Case: 2:21-mj-30574

Judge: Unassigned,

Filed: 12-06-2021 At 10:30 AM

USA v. JAMAR LEE-STINSON (CMP)
(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 3, 2021 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of firearm and ammunition

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 6, 2021City and state: Detroit, Michigan*Complainant's signature*

Task Force Officer Troy D. Williams, ATF

Printed name and title*Judge's signature*

Hon. Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

v.

JAMAR LEE-STINSON,

Defendant.

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UNDER SEAL USA v. JAMAR LEE-STINSON
(CMP)(MLW)

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Troy D. Williams, being duly sworn, hereby depose and state the following:

INTRODUCTION

1. I am a police officer with the Detroit Police Department (DPD) and have been so employed since May of 2016. I am also a federal Task Force Officer (TFO) assigned to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Detroit Field Division. I am certified under the Michigan Commission on Law Enforcement Standards requirements. In addition, I completed the criminal justice undergraduate program, earning a bachelor's degree, at Wayne State University. During my time as a law enforcement officer, I have participated in investigations involving firearms and violations of firearm laws, as well as numerous investigations that resulted in the execution of search and arrest warrants.

2. I make this affidavit based on my personal knowledge from my participation in this investigation, as well as information provided by other law enforcement officials and/or their reports and records. The basis of my knowledge includes: witness interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of court records, reports by other law enforcement officers, and information gained through my training and experience. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all details or facts that exist pertaining to the investigation

3. I submit this affidavit in support of a criminal complaint charging that, on or about December 3, 2021, within the Eastern District of Michigan, the defendant, Jamar LEE-STINSON (Date of Birth xx/xx/2003), knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting commerce, a firearm and ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

PROBABLE CAUSE

A. November 8, 2021 Shooting in Detroit, Michigan

4. On the evening of November 8, 2021, Detroit Police Department (DPD) officers were dispatched to the BP gas station located at 17151 Gilchrist

Street, in Detroit, Michigan, for a report of a shooting. When officers arrived at the scene, they observed what appeared to be bullet holes in a vehicle at the gas station. A witness stated that two groups of males had gotten into a verbal altercation and then fired shots at each other.

5. The gas station was equipped with security video cameras, both inside the gas station's store and outside. A review of that video showed the following events occurred earlier on November 8, 2021:

- a. At approximately 7:00 p.m., a gray Chevrolet Malibu with a white front bumper and quarter panel pulled into the gas station and parked at a gas pump. A black male (subsequently identified as Jamar LEE-STINSON) exited the front passenger seat of the car and walked into the gas station store. LEE-STINSON was wearing a black zip-up jacket with two white stripes on the sleeves, dark colored pants, and a white shirt underneath the jacket. A second black male and a black female also exited the Malibu and went into the gas station store.
- b. Inside the gas station store, LEE-STINSON eventually approached the counter and waited in line, apparently to make a purchase. (The security camera inside the gas station was high resolution, and LEE-STINSON's facial features are clear on the video.) While LEE-STINSON was waiting in line inside the gas station store, a Jeep

Liberty pulled into the gas station, and two unknown black males (hereinafter “UM-1” and “UM-2”) exited the vehicle and walked into the gas station store. As UM-1 passed LEE-STINSON inside the store, UM-1 appeared to grip the handle of a firearm in his right front pocket.

- c. LEE-STINSON then removed what appears to be a handgun from his own waistband and placed it on the store’s checkout counter. LEE-STINSON then completed his purchase, picked his gun back up from the counter, and exited the store. While walking out of the store, LEE-STINSON appeared to be arguing with UM-1 and UM-2. LEE-STINSON then got into the front passenger seat of the Chevrolet Malibu.
- d. Shortly thereafter, UM-1 and UM-2 exited the gas station store. One of them, UM-1, pulled out a handgun and pulled the slide to the rear, which I know from my training and experience is how one chambers a round of ammunition in a handgun.
- e. Around this time, the front passenger door of the Malibu opened and an occupant, believed to be LEE-STINSON (who got into that seat moments earlier), started firing gunshots at UM-1 and UM-2. UM-1 and UM-2 took cover behind the Jeep Liberty vehicle.

- f. The Malibu started to drive out of the gas station parking lot, but then the car stopped, LEE-STINSON got out of the front passenger seat, and he fired more gunshots at UM-1 and UM-2. From the security camera video, it is evident that at least one shot fired by LEE-STINSON impacted a red car, which belonged to a third party. LEE-STINSON then got back into the front passenger seat of the Malibu, and the car drove away heading east on Eight Mile Road.
6. At the gas station, DPD officers located and recovered multiple spent 9mm and .40 caliber casings, as well as bullet fragments.

B. Subsequent Investigation and December 3, 2021 Search Warrant

7. During November 2021, DPD developed an investigative lead that the person captured on the BP gas station security video (wearing the black jacket with two white stripes on the sleeves) might be Jamar LEE-STINSON.
8. In early December 2021, a DPD officer interviewed an associate of LEE-STINSON. When the officer showed a screen capture photograph from the BP gas station security video of LEE-STINSON inside the gas station store on November 8, 2021, the associate identified the individual in the photograph as the person he/she knows as “Mar.” (LEE-STINSON’s first name is Jamar.) The associate stated that he/she has known of “Mar” for a year or two and has met “Mar” in person more recently.

9. DPD obtained information that LEE-STINSON was residing at an apartment located in Southfield, MI (hereinafter, the “Target Residence”). DPD contacted the management company for this residence and confirmed that LEE-STINSON was the lease holder for the Target Residence.

10. On or about December 3, 2021, law enforcement officers executed a state search warrant at the Target Residence. The warrant authorized the search of the Target Residence for, among other things, firearms and ammunition.

11. When law enforcement officers executed the search warrant, LEE-STINSON was present inside the Target Residence in the Southwest bedroom, along with a female and a child. A second male was found in the Southeast bedroom, and a third male was sleeping on the living room couch.

12. During the search of the Target Residence, officers found the following, among other items:

- a. One (1) Glock 26, 9mm pistol, bearing serial number BGHL633, in the couch in the living room. The handgun was loaded with one round in the chamber and a magazine containing fifteen (15) rounds of 9mm ammunition.
- b. One (1) Palmetto PA-15, AR-15 style rifle, bearing serial number LW274358, on the floor of the living room. The rifle was loaded

with one round in the chamber and a magazine containing twenty-six (26) rounds of 5.56 caliber ammunition.

- c. One (1) extended magazine containing nineteen (19) rounds of .40 caliber ammunition, in the Southwest bedroom on top of a bin.
- d. One (1) loose round of .40 caliber ammunition, in the Southwest bedroom on top of the same bin.
- e. A DTE Energy bill, addressed to “Jamar Lee-Stinson,” in the closet of the Southwest bedroom.
- f. A black zip-up jacket with two white stripes on the sleeves, in the closet of the Southwest bedroom. This jacket’s appearance is consistent with the jacket LEE-STINSON is seen wearing on the gas station’s security video from November 8, 2021 (discussed above).

13. On December 4, 2021, I and another law enforcement officer conducted a custodial, Mirandized interview of LEE-STINSON. During the interview, I showed LEE-STINSON two screen capture photos taken from the BP gas station’s November 8, 2021 security video around the time of the shooting. The photos captured the black male who was wearing a black zip-up jacket with two white stripes on the sleeves. LEE-STINSON admitted that he was the person in the photos.

14. During the interview, LEE-STINSON stated that the Palmetto PA-15 rifle found in his living room belonged to his uncle, that he was storing it for his uncle, and that he (LEE-STINSON) had handled the rifle.

15. During the interview, LEE-STINSON acknowledged that he knew he was prohibited from possessing a firearm due to his felony conviction.

C. LEE-STINSON's Criminal History and Analysis of the Seized Firearm

16. A review of LEE-STINSON's criminal history revealed that he has the following felony conviction: on September 30, 2021, he pleaded guilty to Carrying a Concealed Weapon, in violation of Mich. Comp. Laws § 750.227, which is a felony punishable by up to five years in prison. (On November 15, 2021, LEE-STINSON was sentenced to one year of probation.)

17. I am aware that the Michigan Court Rules (which are used in the state court system in Michigan) require a court to advise a criminal defendant of the maximum possible prison sentence for an offense before accepting a plea of guilty or nolo contendere to the charge. Therefore, as a result of LEE-STINSON's aforementioned guilty plea, there is probable cause to believe that he knew that he was a felon and had been previously convicted of a crime punishable by imprisonment for a term exceeding one year when, on December 3, 2021, he possessed the Palmetto PA-15 rifle, bearing serial number LW274358, and the twenty (20) rounds of .40 caliber ammunition inside his residence.

18. According to ATF Special Agent Michael Jacobs, who is an expert in the interstate nexus of firearms, Palmetto firearms are not manufactured in the state of Michigan, and no ammunition is manufactured in the state of Michigan. Therefore, S.A. Jacobs made a preliminary determination that the Palmetto PA-15 rifle, bearing serial number LW274358, and the twenty (20) rounds of .40 caliber ammunition described above were likely manufactured outside the state of Michigan and thus had traveled in interstate commerce from their points of manufacture to Michigan.

CONCLUSION

19. Based on the foregoing, there is probable cause to believe that on or about December 3, 2021, within the Eastern District of Michigan, Jamar LEE-STINSON, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm—to wit, a Palmetto PA-15 rifle, bearing serial number LW274358—and knowingly possessed ammunition—to wit, twenty (20) rounds of .40 caliber ammunition—said firearm and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).



Troy D. Williams
Task Force Officer
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn and subscribed to
before me and/or by reliable electronic
means this 6th day of December, 2021.



HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE